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**UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

State of Arizona, *ex rel.* Kristin K. Mayes,
Attorney General, *et al.*,

CASE NO.: 4:23-cv-00233- TUC-CKJ
(MAA)

Plaintiffs,

V.

Michael D. Lansky, L.L.C., dba Avid Telecom, *et al.*,

Defendants.

**PLAINTIFFS' MOTION TO
DETERMINE THE SUFFICIENCY
OF DEFENDANTS' RESPONSES
AND OBJECTIONS TO
PLAINTIFFS' FIRST REQUESTS
FOR ADMISSION**

Pursuant to Rule 36(a)(6) of the Federal Rules of Civil Procedure, Plaintiff States (collectively, “Plaintiffs”), respectfully request the Court to determine the sufficiency of certain answers and objections from Defendants Michael D. Lansky, L.L.C. dba Avid Telecom (“Avid Telecom”), Stacey S. Reeves (“Reeves”), and Michael D. Lansky (“Lansky”), collectively, “Defendants”, in response to Plaintiffs’ First Set of Requests for Admission (the “Requests”).

This Motion is supported by the following Memorandum of Points and Authorities, the Declaration of Sarah Pelton and the exhibits attached thereto, any oral argument that

1 may be heard on this issue, all other pleadings and papers on file in this action, and any
 2 other evidence that may be presented to the Court.

3

4 **GOOD FAITH CONSULTATION CERTIFICATE**

5 In accordance with Rule 37(a)(1) of the Federal Rules of Civil Procedure and Local
 6 Rule 7.2(j), undersigned counsel represents that prior to filing the instant Motion, Plaintiffs
 7 attempted to personally confer with Defendants' counsel regarding their failure to respond
 8 to Plaintiffs' Requests, but to no avail. *See Declaration of Sarah Pelton ("Pelton Decl."),*
 9 dated December 5, 2025 at ¶¶ 8-9, Ex. G. Accordingly, Plaintiffs were left with no
 10 alternative other than to file and serve this Motion.

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13 **MEMORANDUM OF POINTS AND AUTHORITIES**

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I. **INTRODUCTION**

15 Plaintiffs brought this lawsuit to protect consumers from Defendants' illegal
 16 telemarketing and robocall schemes. As set forth in the Complaint, Defendants Avid
 17 Telecom, Lansky and Reeves are in the business of providing Voice over Internet Protocol
 18 ("VoIP") services, facilitating or initiating robocalls, and/or helping others make illegal
 19 robocalls – in violation of multiple state and federal laws.

20

21 On August 20, 2025, Plaintiffs served Defendants with the Requests seeking
 22 admission of relevant and admissible evidence in Defendants' knowledge related to
 23 Plaintiffs' causes of action under the Telemarketing and Consumer Fraud and Abuse
 24 Prevention Act, the Telemarketing Sales Rules, the Telephone Consumer Protection Act,
 25 the Truth in Caller ID Act, as well as other state and federal laws, and Defendant Avid
 Telecom's claimed defenses thereto. *See Pelton Decl. at ¶ 3, Ex. A.*

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27 In violation of Rule 36, Defendants failed to provide timely and sufficient responses
 28 to Plaintiffs' Requests. *See Pelton Decl. at ¶ 6.* Accordingly, Plaintiffs request the Court to
 determine the sufficiency of Defendants' untimely responses.

1 **II. RELEVANT FACTS**

2 On or around August 20, 2025, Plaintiffs served each Defendant with the Requests
 3 pursuant to Rule 36 of the Federal Rules of Civil Procedure. *See* Pelton Decl. at ¶ 3, Ex. A.
 4 The Requests sought relevant discovery regarding matters at the heart of the Complaint
 5 and Defendants' defenses thereto, namely admissions concerning Defendants' business of
 6 facilitating, initiating, and/or helping others make illegal robocalls; Defendants' business
 7 records evidencing illegal telemarketing and robocalling activity; Defendants' purposeful
 8 failure to implement any mitigating or corrective measures to prevent the perpetration of
 9 illegal telemarketing and robocalling activity; and the monies and compensation
 10 Defendants earned through its illegal telemarketing and robocalling activity. *Id.* at Ex. A.

11 Pursuant to Rule 36(a)(3), Defendants were required to provide responses to
 12 Plaintiffs' Requests by September 19, 2025. *See* Fed. R. Civ. P. 36(a)(3) ("A matter is
 13 admitted unless, within 30 days of being served, the party to whom the request is directed
 14 serves on the requesting party a written answer or objection").

15 On or around September 19, 2025, defense counsel emailed Plaintiffs' counsel
 16 seeking an extension until September 23, 2025 to serve Defendants' responses. *See* Pelton
 17 Decl. at ¶ 5, Ex. B. Plaintiffs' counsel stipulated to the requested extended deadline;
 18 however, Defendants did not serve their responses until September 24, 2025. *Id.* at ¶ 6-7,
 19 Exs. C-F. Defendants' untimely responses were insufficient as they were replete with
 20 numbering and typographical errors, relied on meritless and boilerplate objections, and
 21 failed to address the substance of the Requests. Additionally, Defendant Reeves served a
 22 replacement set of RFAs the same day, as defense counsel recalled the first copy for
 23 retaining attorney work product. *Id.* at ¶ 7.

24 On or around October 17, 2025, Plaintiffs' counsel sent a meet and confer email
 25 correspondence to defense counsel regarding Defendants' deficient responses. *Id.* at ¶ 8,
 26 Ex. G. Defense counsel failed to respond to Plaintiffs' correspondence. *Id.* at ¶ 9.

1 On or around November 24, 2025, the Court held a discovery status conference for
2 the parties, where Plaintiffs outlined the same concerns regarding Defendants' Responses
3 as in the October 17, 2025 meet and confer email and detailed further below. During the
4 conference, defense counsel repeatedly asserted the false statement they had produced
5 supplemental Responses for all Defendants. *Id.* at ¶ 10. Later that week, defense counsel
6 emailed Plaintiffs concerning their so-called "supplemental" Responses and asked what
7 "other problems" Plaintiffs had with Defendants' Responses. *Id.* at ¶ 11, Ex. H. Plaintiffs
8 responded, explaining that Plaintiffs were only in receipt of replacement responses from
9 Defendant Reeves and attached the October 17, 2025 meet and confer email detailing
10 Plaintiffs' concerns with Defendants' Responses. *Id.* at ¶ 12, Ex. I.

11 Instead of acknowledging their mistake, defense counsel doubled down on the claim
12 that their initial Responses produced on September 24, 2025 were instead supplemental
13 responses. *Id.* at ¶ 13, Ex. J. In their reply, Plaintiffs stated their understanding as such and
14 that Plaintiffs had not received any supplemented responses from any Defendant since the
15 September 24, 2025 production. *Id.* at ¶ 14, Ex. K. Defense counsel then sent a
16 supplemented version of Reeves' Responses that were post-dated to October 23, 2025, and
17 stated that supplemented versions of Defendant Lansky and Defendant Avid Telecom's
18 Responses would be sent "shortly." *Id.* at ¶ 15, Exs. L-M. In a separate email later that day,
19 defense counsel also falsely claimed that the October 17, 2025 meet and confer email
20 "advise[d] of deficiencies in the Reeves responses only", and sent another version of
21 supplemented responses for Defendant Reeves on November 26, 2025 that contained
22 attorney work product. *Id.* at ¶ 16, Ex. N. Plaintiffs responded and assured defense counsel
23 that the meet and confer email highlighted deficiencies in *all* Defendants' Responses, not
24 just Defendant Reeves. *Id.* at ¶ 17, Ex. O. Defense counsel later served deficient
25 supplemented Responses for Defendant Reeves with no attorney work product on or
26 around December 1, 2025. *Id.* at ¶ 18, Ex. P.

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1 Plaintiffs have attempted multiple times to clear up this issue with Defendants both
 2 before and after the Court's status conference to no avail. Accordingly, left with no other
 3 alternative, Plaintiffs were forced to file and serve the instant motion.

4 **III. ARGUMENT**

5 **A. Defendants' Responses are Untimely and are Deemed Admitted under Rule 36**
of the Federal Rules of Civil Procedure.

6 Rule 36 of the Federal Rules of Civil Procedure obligates the party to whom a
 7 request for admission is directed to respond in writing to the requests within 30 days after
 8 being served. *See Fed. R. Civ. P. 36(a)(3)*. Failure to respond to Requests within the 30-
 9 day window results in automatic admission of all material contained in the Requests. *Fed.*
 10 *R. Civ. P. 36(b); see Hadley v. U.S.*, 45 F.3d 1345, 1348 (9th Cir. 1995) (“[I]f a party fails
 11 to answer a request for admissions within 30 days, the requested items are deemed
 12 admitted.”); *FTC v. Medicor, LLC*, 217 F. Supp.2d 1048, 1053 (C.D. Cal. 2002) (“No
 13 motion to establish [late] admissions is needed because [Rule 36] is self executing.”);
 14 *Wyles v. Sussman*, 445 F. Supp. 3d 751, 756 (C.D. Cal. 2020).

15 Here, Defendants were served with Plaintiffs' Requests for Admission on August
 16 20, 2025. *See* Pelton Decl. at ¶ 3, Ex. A. The original statutory deadline for Defendants to
 17 serve their responses was Friday, September 19, 2025. However, Defendants did not serve
 18 any responses by that date. Instead, on the very day their responses were due, Defendants
 19 sought an extension of time to respond. *Id.* at ¶ 5, Ex. B.

20 The parties subsequently stipulated to extend Defendants' deadline to respond to
 21 September 23, 2025. *Id.* at ¶ 5, Ex. B. Despite this accommodation, Defendants again failed
 22 to meet their deadline and did not serve their responses until September 24, 2025. *Id.* at ¶¶
 23 6-7, Exs. C-F. Because Defendants failed to serve timely responses by both the statutory
 24 and stipulated deadlines, their untimely responses must be deemed admissions pursuant to
 25 Rule 36(a)(3) of the Federal Rules of Civil Procedure.
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1 **B. Defendants' Untimely Responses Are Replete With Unintelligible Errors and**
 2 **Improper Objections Making Them Insufficient under the Federal Rules of**
 3 **Civil Procedure.**

4 Even if the Court were to excuse Defendants' untimeliness (*arguendo*), their
 5 responses are nonetheless deficient and violate Rule 36 of the Federal Rules of Civil
 6 Procedure.

7 **1. Defendant Reeves' Responses Are Insufficient Because They Contain**
 8 **Numerous Errors Rending Them Unintelligible and Unusable at Trial.**

9 Defendants' untimely responses are insufficient because they contain typographical
 10 errors that render them unintelligible and unusable. Defendant Reeves' initial and
 11 supplemented responses inconsistently refer to the Defendant in both the first and third
 12 person, further compounding the confusion and lack of clarity in Defendant Reeves'
 13 responses.¹ These pervasive errors make it impractical to rely on the responses for any
 14 evidentiary or procedural purpose.

15 The numerous typographical errors contained in Defendant Reeves' initial untimely
 16 Responses, and still present in her supplemented Responses, render them insufficient under
 17 Rule 36 and require Defendant Reeves to serve corrected and supplemental responses that
 18 clearly correspond to each Request.

19 **2. Defendants' Responses are Insufficient Because They Rely on Meritless**
 20 **and Boilerplate Objections.**

21 Defendants' untimely responses are further deficient because they rely almost
 22 entirely on meritless and boilerplate objections. Rule 36 requires any party objecting to a
 23 request for admission to state “[t]he grounds for objecting[.]” Fed. R. Civ. P. 36(a)(5).
 24 Boilerplate or copy-and-pasted objections to requests for admission are not sufficient. *A.*
 25 *Farber & Partners, Inc. v. Garber*, 234 F.R.D. 186, 188 (C.D. Cal. 2006) (“[G]eneral or

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 28 ¹ See Reeves Supplemented Response Nos. 40, 58, 85, 91, 99, 102, 113, 122, 128, 131,
 134, 137, 140, 148, 151, 161, 181, 185, 189, 193, 197, 205, 211, 215, 219, 223, 227, 231,
 235, 243, 255, 259.

1 boilerplate objections such as ‘overly burdensome and harassing’ are improper—especially
 2 when a party fails to submit any evidentiary declarations supporting such objections,” and
 3 “boilerplate relevancy objections, without setting forth any explanation or argument why
 4 the requested documents are not relevant, are improper.”); *Duran v. Cisco Sys., Inc.*, 258
 5 F.R.D. 375, 379 (C.D. Cal. 2009) (noting that “unexplained and unsupported boilerplate
 6 objections are improper”); *Pellerin v. Wagner*, No. 2:14-cv-02318-JWS, 2016 WL 950792
 7 at *1 (D. Ariz. Mar. 14, 2016). An objection that a request is “ambiguous” is not a sufficient
 8 ground unless the request is so ambiguous that a party cannot make good faith, intelligent
 9 reply.

10 Here, Plaintiffs’ Requests are simple, narrow, and seek relevant and admissible
 11 admissions related to Plaintiffs’ causes of action under the Telemarketing and Consumer
 12 Fraud and Abuse Act, the Telemarketing Sales Rule, the Telephone Consumer Protection
 13 Act, the Truth in Caller ID Act, and other state and federal laws protecting consumers
 14 against deceptive and illegal telemarketing practices and Defendants’ claimed defenses
 15 thereto. Specifically, these Requests seek relevant admissions relating to:

- 16
- 17 1. Defendants’ direct/indirect knowledge of and involvement in
 18 assisting, facilitating, servicing, managing, permitting and compensating
 19 telemarketers, customers and/or sellers in transmitting and delivering millions
 20 of prerecorded telephone and robocalls²;

23 ² Request to Reeves Nos. 9, 14-158, 161-63, 165-67, 169-71, 173-75, 177-79, 181-83, 185-
 24 87, 189-91, 193-95, 197-99, 201-03, 205-09, 211-13, 2115-17, 219-21, 223-25, 227-29,
 25 231-33, 235-37, 239-41, 243-45, 247-62, 264-75, 280-82, 284-89, 291-93, 295-97, 299,
 308-310; Request to Avid Telecom Nos. 1-156, 159-61, 163-65, 167-69, 171-73, 175-77,
 179-81, 183-85, 187-89, 191-93, 195-97, 199-201, 203-07, 209-11, 213-15, 217-19, 221-
 26 225-27, 229-31, 233-35, 237-39, 241-43, 245-60, 262-68, 274-76, 278-80, 282-83, 285-
 27 87, 297-99; Request to Lansky Nos. 1-156, 159-61, 163-65, 167-69, 171-73, 175-77, 179-
 28 81, 183-85, 187-89, 191-93, 195-97, 199-201, 203-07, 209-11, 213-15, 217-19, 221-23,
 225-27, 229-31, 233-35, 237-39, 241-43, 245-60, 262-74, 279-85, 287-97, 299-300, 302-
 04, 314-16.

1 2. Defendants' knowledge of and compliance with applicable Federal
 2 and State laws and regulations regarding corporate record retention,
 3 telemarketing and robocall schemes³;

4 3. The procedures and methods to prevent—or even significantly
 5 mitigate—the perpetration of illegal call traffic onto and across Defendants'
 6 Avid Telecom's network⁴;

7 4. Defendants' prior statements regarding knowledge of and compliance
 8 with applicable Federal and State laws, regulations, and previous litigation
 9 regarding corporate record retention, telemarketing and robocall schemes⁵;

10 5. The veracity of Defendant Reeves's claims that she is/was "limited in
 11 her role as an independent contractor"⁶;

12 6. Evidentiary admissions regarding Defendants' existing document
 13 production⁷.

14
 15 In response to these Requests, Defendants assert the same tired objections, over and
 16 over, without explaining how the objections actually apply to each individual Request.
 17 Defendants repeat that the Requests are irrelevant, vague and ambiguous and call for legal
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20 ³ Request to Reeves Nos. 1-8, 12, 13; Request to Avid Telecom Nos. 269-71; Request to
 21 Lansky Nos. 275-76.

22 ⁴ Request to Reeves Nos. 10-11, 276-79; Request to Avid Telecom Nos. 157-58, 272-73;
 23 Request to Lansky Nos. 277-78.

24 ⁵ Request to Reeves Nos. 159-60, 164, 168, 172, 176, 180, 184, 188, 192, 196, 200, 204,
 25 210, 214, 218, 222, 226, 230, 234, 238, 242, 246, 263; Request to Avid Telecom Nos. 157-
 26 58, 162, 166, 170, 174, 178, 182, 186, 190, 194, 198, 202, 208, 212, 216, 220, 224, 228,
 27 232, 236, 240, 244, 261; Request to Lansky Nos. 157-158, 162, 166, 170, 174, 178, 182,
 28 186, 190, 194, 198, 202, 208, 212, 216, 220, 224, 228, 232, 236, 240, 244, 261.

2 ⁶ Request to Reeves Nos. 300-07; Request to Avid Telecom Nos. 289-96; Request to
 Lansky Nos. 306-313.

2 ⁷ Request to Reeves Nos. 283, 290, 294, 298; Request to Avid Telecom Nos. 277, 281,
 28 284, 288; Request to Lansky Nos. 286, 298, 301, 305.

1 conclusions based on “specialized definitions” to which Defendants do not agree.⁸ But
 2 Defendants’ boilerplate and generalized objections are inadequate under the Rules and are
 3 tantamount to no objection at all. *See Walker v. Lakewood Condo. Owners Ass’n*, 186
 4 F.R.D. 584, 587 (C.D. Cal. 1999) (“Boilerplate, generalized objections are inadequate and
 5 tantamount to not making any objection at all.”). For example, Defendants frequently
 6 object to the terms like “Business Relationship” as vague and ambiguous, although
 7 Plaintiffs defined this and other terms with ample specificity in their instructions.
 8 Defendants provide no substantiation to their frequent assertions that a Request is
 9 irrelevant. Additionally, in response to certain Requests⁹, Defendant Reeves’s Responses
 10 begin with “Response: Response:”. The fact that this error and others similar were repeated
 11 multiple times further highlights the boilerplate or cut-and-paste nature of Defendants’
 12 responses and objections.¹⁰

3. Defendants’ Untimely and Supplemented Responses Are Insufficient
Because They are Evasive, Qualified, and Based on an Unreasonable
Reading of Plaintiffs’ Actual Requests.

16 Defendants’ untimely and supplemented responses are also insufficient because
 17 they are evasive and based on Defendants’ unilateral qualifications and unreasonable
 18 interpretations of Plaintiffs’ actual Requests. Federal Rule of Civil Procedure 36 requires
 19 the answering party to respond in one of three ways to a Request for Admission: (1) admit
 20 the Request; (2) deny the Request; or (3) explain “why the answering party is unable to
 21 admit or deny the matter.” Fed. R. Civ. P. 36(a)(4); *see also AmeriPride Servs., Inc. v.*
22 Valley Indus. Servs., Inc., No. CIV 2:00-cv-0113-LKK-JFM, 2011 WL 1321873, at *2
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 25 ⁸ *See, e.g.* Lansky Response No. 27 (objecting to “Telephony Services” because “he does
 26 not agree” with Plaintiffs’ definition); Reeves Response No. 1 (objecting to
 27 “Interconnected VoIP services”); Avid Telecom Response No. 36 (objecting to “Non-
 Provider Customer”).

28 ⁹ *See, e.g.*, Reeves Supplemented Response Nos. 44, 63, 73, 199.

¹⁰ *See, e.g.*, Reeves Supplemented Response Nos. 15, 21-22, 24, 26, 29, 31, 43, 44, 60, 63,
 73, 84, 106-07, 199, 215, 279.

1 (E.D. Cal. Apr. 1, 2011). Rule 36 serves to expedite matters for trial by “establishing certain
 2 material facts as true and thus narrowing the range of issues[.]” *Asea, Inc. v. Southern Pac.*
 3 *Transp. Co.*, 669 F.2d 1242, 1245 (9th Cir. 1981). “A denial must fairly respond to the
 4 substance of the matter; and when good faith requires that a party qualify an answer or
 5 deny only a part of a matter, the answer must specify the part admitted and qualify or deny
 6 the rest.” Fed. R. Civ. P. 36(a)(4).

7 Requests for admission should not focus on evasion and word play. *Marchand v.*
 8 *Mercy Med. Ctr.*, 22 F.3d 933, 936 (9th Cir. 1994) (“Parties may not view requests for
 9 admission as a mere procedural exercise requiring minimally acceptable conduct.”). When
 10 the purpose and significance of a request are reasonably clear, courts do not permit denials
 11 based on an overly technical reading of the request. *Holmgren v. State Farm Mut. Auto.*
 12 *Ins. Co.*, 976 F.2d 573, 580 (9th Cir. 1992) (“[E]pistemological doubts speak highly of [a
 13 party's] philosophical sophistication, but poorly of its respect for Rule 36(a).”); *see also*
 14 *U.S. ex rel. Englund v. Los Angeles Cty.*, 235 F.R.D. 675, 684 (E.D. Cal. 2006) (“[A] party
 15 who is unable to agree with the exact wording of the request for admission should agree to
 16 an alternate wording or stipulation.”). Further, evasive denials, or responses that do “not
 17 set forth in detail the reasons why the answering party cannot truthfully admit or deny the
 18 matter, may be deemed an admission.” *Asea, Inc.*, 669 F.2d at 1245.

19 Here, a majority, if not the entirety, of each Defendant’s responses are deficient
 20 under Rule 36 because they (1) explicitly premise each response on stated objections, (2)
 21 improperly introduce unsupported opinions about observance of industry standards of care,
 22 and (3) claim they are unable to understand common terms.

23 Specifically, many responses include an unnecessary, self-serving qualification that
 24 Avid Telecom complied with all applicable state and federal regulations, which few, if any,
 25 of the Requests actually sought.¹¹ Rule 36 does not permit Defendants to rewrite Plaintiffs’
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 28 ¹¹ See, e.g., Reeves Supplemented Response No. 55 (**Request:** “Admit that Defendant Avid
 Telecom had a Business Relationship with Airespring.” **Response:** “Subject to and without

1 specifically defined terms and fundamentally alter the terms of the request to avoid
 2 responding to the question Plaintiffs asked. Further, responses to nearly identical Requests
 3 are inconsistent from defendant to defendant. In response to Request 8, Defendant Reeves
 4 states she does not understand easily recognizable terms that do not require a separate
 5 definition, such as “Universal Service Fund filing”, but Defendants Lansky and Avid
 6 Telecom do understand the term in their responses to Request 8. Additionally, in many
 7 instances where Defendants have issues on definitions, they do not provide a response at
 8 all, such as Defendant Reeves’s response to Request No. 291, where she objected that the
 9 word “exclusive” was too vague. Finally, many of Defendants’ responses are unintelligible
 10 and lack a clear indication of admission or denial.¹²

11 Defendants’ deliberate efforts to evade and alter the substance of the Requests
 12 propounded upon them are improper and in direct violation of Rule 36 of the Federal Rules
 13 of Civil Procedure. Rule 36(a)(4) requires Defendants to admit or specifically deny each
 14 Request or state in detail why they cannot, which Defendants failed to do, instead relying
 15 on improper boilerplate objections and qualifications. Consequently, Plaintiffs request the
 16 Court order Defendants to strike the responses to the certain aforementioned Requests and
 17 order Defendants to serve new responses.

18 waiving the General Objections and the Specific Objections stated above, Reeves admits
 19 that to the best of her current recollection, knowledge and belief, and on the understanding
 20 that Reeves had no authority to agree to establish a Business Relationship, it is her
 21 understanding that Avid Telecom had a Business Relationship with Airespring. It is my
 22 recollection that, among other things, the agreement governing that ‘Business
 23 Relationship’ required Airespring to represent and warrant to Avid Telecom that all of the
 24 traffic that they sent to Avid Telecom complied with all applicable state and federal
 25 regulations, specifically including without limitation, all state and federal regulations
 governing robocalls”); Lansky Response No. 33, Avid Telecom Response No. 68.

26 ¹² E.g. Lansky Response to Request No. 10 (“Lansky denies that, to the best of his current
 27 recollection, knowledge and belief, it is his understanding that Lansky has never, either
 28 directly or through a third party (e.g., a third-party switch provider), have ever instituted or
 implemented any policies or processes. . .”); Reeves’s Supplemented Responses to Request
 Nos. 58, 85, 91, 99, 102, 113, 122, 128, 131, 134, 137, 140, 148, 151, 161, 181, 185, 189,
 193, 197, 205, 211, 215, 219, 223, 227, 231, 235, 243, 255, 259.

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3 **IV. CONCLUSION**

4 For the reasons set forth above, Plaintiffs respectfully request the Court to order
5 Defendants to provide responses without objection to Plaintiffs' First Set of Requests for
6 Admission.

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1 RESPECTFULLY SUBMITTED this 5th day of December 2025.
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CERTIFICATE OF SERVICE

I hereby certify that on December 5, 2025, I caused the foregoing
PLAINTIFFS' MOTION TO DETERMINE THE SUFFICIENCY OF
DEFENDANTS' RESPONSES AND OBJECTIONS TO PLAINTIFFS' FIRST
REQUESTS FOR ADMISSION to be filed and served electronically via the Court's
CM/ECF system upon counsel of record.

/s/ Sarah Pelton

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